

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

DON HOLLAND, individually and on behalf of all
others similarly situated,

Plaintiff,

vs.

Civil Action No. 1:23-cv-110

CRYPTOZOO INC., a Delaware Corporation,
LOGAN PAUL, DANIELLE STROBEL, JEFFREY
LEVIN, EDUARDO IBANEZ, JAKE
GREENBAUM a/k/a CRYPTO KING, and OPHIR
BENTOV a/k/a BEN ROTH,

Defendants.

_____ /

LOGAN PAUL,

Cross-Plaintiff,

vs.

EDUARDO IBANEZ and
JAKE GREENBAUM a/k/a CRYPTO KING,

Cross-Defendants.

_____ /

**AFFIDAVIT OF BENJAMIN WIDLANSKI IN SUPPORT OF CROSS-PLAINTIFF'S
MOTION FOR DEFAULT JUDGMENT**

STATE OF FLORIDA)
) SS:
COUNTY OF MIAMI-DADE)

Before me, the undersigned Notary, on this 18th day of June, 2024, personally appeared
Benjamin Widlanski, who being duly sworn states as follows:

1. My name is Benjamin Widlanski. I am a partner at Kozyak Tropin & Throckmorton LLP and represent Cross-Plaintiff Logan Paul in the above-captioned action.

2. The facts in this affidavit are based on my own personal knowledge, or those who report to me, and if called as a witness I could, and would, testify competently to those facts.

3. On January 4, 2024, Mr. Paul filed a Crossclaim (ECF No. 55) against Cross-Defendants Eduardo Ibanez and Jake Greenbaum a/k/a “Crypto King” asserting claims for fraudulent inducement and fraudulent misrepresentation against both Cross-Defendants.

4. Specifically, the Crossclaim alleges that Messrs. Ibanez’s and Greenbaum’s conduct has caused Mr. Paul “significant monetary damages and reputational harm,” for which Mr. Paul is seeking actual and compensatory damages, punitive damages, and his attorneys’ fees and costs.

5. Eduardo Ibanez is neither a minor nor an incompetent person.

6. Eduardo Ibanez is not in the military service of the United States as defined by the Servicemembers Civil Relief Act, 50 U.S.C. § 3911(2).

7. Jake Greenbaum is neither a minor nor an incompetent person.

8. Jake Greenbaum is not in the military service of the United States as defined by the Servicemembers Civil Relief Act, 50 U.S.C. § 3911(2).

9. On January 5, 2024, the Clerk of the United States District Court for the Western District of Texas issued summonses for service on the Cross-Defendants Ibanez and Greenbaum (the “Summons,” ECF No. 58).

10. On March 18, 2024, Mr. Paul filed proof of service on Eduardo Ibanez. (ECF No. 67.) Service of process was effectuated on Mr. Ibanez on March 7, 2024, by personal service of

the Summons and Crossclaim at 20 Greene Street, Apt. #4, New York, New York 10013, on a person of suitable age and discretion at Mr. Ibanez's actual dwelling place or usual place of abode.

11. On April 18, 2024, the Court granted Mr. Paul's motion for alternative service on Jake Greenbaum a/k/a Crypto King and for a 30-day extension of time to complete service, authorizing Mr. Paul to serve Mr. Greenbaum by email and by direct message on X, the social media platform. (ECF No. 71.)

12. On April 29, 2024, Mr. Paul filed proof of alternate service on Mr. Greenbaum. (ECF No. 72.) Service of process was effectuated on Mr. Greenbaum on April 23, 2024, by email and by direct message on X.

13. Pursuant to Federal Rule of Civil Procedure 12, Cross-Defendant Ibanez was required to file an answer or response to the Crossclaim on or before March 28, 2024.

14. Pursuant to Federal Rule of Civil Procedure 12, Cross-Defendant Greenbaum was required to file an answer or response to the Crossclaim on or before May 14, 2024.

15. Neither Mr. Ibanez nor Mr. Greenbaum has been granted any extension of time to respond to the Crossclaim, and both have failed to answer or otherwise respond to the Crossclaim.

16. On April 1, 2024, Mr. Paul filed a motion for entry of clerk's default against Mr. Ibanez. (ECF No. 69.) On May 15, 2024, Mr. Paul filed a motion for entry of clerk's default against Mr. Greenbaum. (ECF No. 73.) The Clerk of the Court entered default against Mr. Ibanez on April 17, 2024, and against Mr. Greenbaum on May 16, 2024. (ECF Nos. 70, 74.)

17. A copy of *Cross-Plaintiff Logan Paul's Motion for Default Judgment Against Cross-Defendants Eduardo Ibanez and Jake Greenbaum a/k/a Crypto King* and related papers shall be served on Cross-Defendant Eduardo Ibanez via First Class Mail and on Cross-Defendant Jake Greenbaum via email.

The undersigned hereby declares under penalty of perjury pursuant to the laws of the United States that the foregoing is true and accurate based upon his information, knowledge, and belief.

Dated: June 18, 2024


Benjamin Widlanski

The foregoing Affidavit was acknowledged before me by means of ☒ physical presence or ☐ online notarization, this 18th day of June 2024, by Benjamin Widlanski, who is personally known to me.


Notary Public, State of Florida

My commission expires:

